

# ASH GROVE CEMENT COMPANY



WESTERN REGION

January 19, 2000

Elizabeth Gilpin  
Puget Sound Clean Air Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Ms. Gilpin:

**Re: Compliance Status Report Dated 01/10/00**

The following is further information as you requested concerning items noticed on your plant visit of January 10.

**Pan Conveyor Enclosure:**

The positive pressure noticed in the Pan Conveyor head house is not necessarily indicative of a problem with the G-Cooler Baghouse. As itemized in the report from Davis Maars, There is a strong chimney effect from the heat in the enclosure. The idea was to erect a wall between the length of the conveyor and the head house with the dust collector line re-routed to draft the conveyor enclosure itself, thus reducing this chimney effect. The report stated that this would "reduce" the amount of positive pressure in the enclosure. Mr. Maars's report stated that this has happened. We still have to install a door in the newly erected wall. This should further alleviate the pressure. Our plan is to keep the outside doors closed as per Mr. Maars's suggestion to contain any potential fugitive emissions that would be caused by the positive pressure. This is not a high traffic area. Unless there has been a problem noted such as a plugged chute, personnel do not routinely inspect the area.

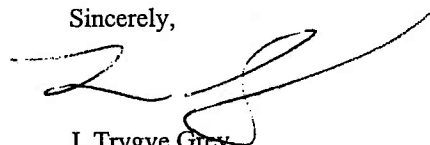
**Kiln Seal:**

Upon investigation of the noticed dusting, it was found that the down pipe used to direct spilled material from the kiln seal was plugged. This caused fugitive emissions rather than have the dust be directed to a contained hopper. The pipe was unplugged on January 11 and the dusting was abated.

**General:**

Problems of the nature addressed on this CSR are documented by the Production Manager. The Production Manager will then determine and administer the best corrective action for that particular situation.

Sincerely,



J. Trygve Grey  
Process Engineer

# PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500,

Fax: 206-465-1100

Registration No. 11339

## COMPLIANCE

Date of Report Jan. 10<sup>th</sup>

Source Name

Ash Grove Cement Co.

Location

3801 E. Marginal Way S. Seattle 98134

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies:

Reg. I 9.15 (a) Fugitive dust from equipment is unlawful unless reasonable precautions are employed.

Reg I 9.20 Registered equipment must be maintained in good working order

• During our Jan 10<sup>th</sup> inspection of your facility, we observed heavy visible emissions from Pan Conveyor Penthouse through open floor - positive pressure indicates problem with G-Cooler Baghouse.

• Heavy visible emissions every 10 seconds from Kiln Seal (west end). No documentation or corrective action regarding these problems on site.

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Submit documentation of problems & corrective action taken. Include your procedure to document and correct problems in the future

Issued by:

Received by:

Signing this is not an admission of guilt

WAC 173-470-110 Particle fallout standards.

WAC 173-470-110 Particle fallout standards.

173470110

Particle fallout shall not exceed the standards enumerated below at the conditions stated.

(1) The particle fallout rate measured at a primary air mass station, ground level monitoring station or special station shall not exceed:

→ (a) Ten grams per square meter ( $10 \text{ g/m}^2$ ) per month in an industrial area; or

(b) Five grams per square meter ( $5 \text{ g/m}^2$ ) per month in an industrial area if visual observations show a presence of wood waste and the volatile fraction of the sample exceeds seventy percent.

(c) Five grams per square meter ( $5 \text{ g/m}^2$ ) per month in residential and commercial areas.

(d) Three and one-half grams per square meter ( $3.5 \text{ g/m}^2$ ) per month in residential and commercial areas if visual observations show the presence of wood waste and the volatile fraction of the sample exceeds seventy percent.

(2) In recognition of natural dust in areas of the state, the following exceptions apply to areas east of the Cascade range crest. When concentrations measured at approved background locations exceed three and one-half grams per square meter ( $3.5 \text{ g/m}^2$ ) per month, the particle fallout rate measured at a primary air mass station, ground level monitoring station or special station, shall not exceed:

(a) Six and one-half grams per square meter ( $6.5 \text{ g/m}^2$ ) per month plus background in an industrial area; or

(b) One and one-half grams per square meter ( $1.5 \text{ g/m}^2$ ) per month plus background in residential and commercial areas.

The provisions of WAC 173-470-110 (1) (b) and (d) pertaining to wood waste shall continue to apply regardless of background.

OBTAIN  
COLLECTION  
PROCEDURE

Rec'd  
Mr 3/13/00

**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**

Date of Report March 10, 19 2000 at \_\_\_\_\_ .m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback Plant Manager</u>
Location <u>3801 E. Marginal Way So. Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection of your Jan 2000 CEM Report I noted the following deficiencies:

DATE	Pollutant	Permit Cond.	Standard	Max Above Standard	Duration
<u>1/23/00</u>	<u>NOx</u>	<u>NG 7381 #5(b)</u>	<u>700 ppm 7hr</u>	<u>1.028 ppm</u>	<u>4 hrs.</u>

This Violation will not be subject to penalty per the  
9/10/98 interim CEM policy which is not board  
approved and is subject to change

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

3-10-00  
Issued by: [Signature]

Received by \_\_\_\_\_

Signing this is not an admission of guilt





## PUGET SOUND CLEAN AIR AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038, *12*

206-348-8800 1-800-552-3565 Fax: 206-343-7522

*Rec'd  
10/10/00*

Case No.

### Compliance Status Report

Date of Report 9/29/00

at 15:00

Source Name  <b>Ash Grove Cement Co.</b>	Responsible Person, Title  <b>Henrik Voldbaek Plant Manager</b>
Location  <b>3801 E. Marginal Way So. Seattle, WA. 98134-1113</b>	

☒ During my inspection I noted the following deficiencies:

During our September 26, 2000 complaint response and on-site visit to your facility, we observed continuous visible emissions coming from the main stack. We were informed that the emissions were a result of ammonium sulfate condensing outside of the stack.

Pursuant to WAC 173-401-620(2)(e) Request for Information, Please report to us the cause and source of these emissions and estimate the amounts emitted as we have not seen these emissions reported in your annual emissions inventory to date.

Please verify the constituents of the visible plume and how often this situation occurs. Please review any available source test data or literature to estimate the quantity of the emissions. Please also forward your daily visible emission observations for the main stack. If you don't have such a log, we recommend that you develop and implement one.

Please submit a written report **within ten (30) working days** describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued By: *[Signature]*

Received By: \_\_\_\_\_

**Signing this is not an admission of guilt**

Here is a summary\* of what you need to know about your Compliance Status Report (CSR)

Don't ignore a CSR. This could result in a Notice of Violation (NOV) being issued against you without further notice. If the deficiencies / violations are significant, the Agency could bring a civil suit against you and your business. If a violation continues, each day will be considered a separate and distinct violation.

You must correct the problem as soon as possible and submit a letter to the Agency inspector who issued the CSR - detailing the corrective action you have taken or propose to take. This letter is due within ten (10) days of the date the CSR was received and must contain:

- ◆ Name of the person representing the business;
- ◆ Name and address of the business;
- ◆ Mailing address (if different than written on the NOV);
- ◆ NOV number (upper right-hand corner of NOV);
- ◆ A statement that you have made the necessary corrections or a schedule to achieve compliance; and
- ◆ A commitment to avoid future violations.

You may request a conference with the Agency staff to discuss any extenuating circumstances and review the corrective actions you have identified. This is an opportunity to present information that may not have been considered when the CSR was issued. A request for this conference must be made in writing.

You may appeal the Corrective Action Order, which appears on the CSR. If you appeal, you must file the appeal with the Pollution Control Hearings Board (PCHB) at the address below within thirty (30) days of the date that you received the CSR and Corrective Action Order and send the Agency a copy of the appeal. An appeal must contain the following information:

- ◆ Your name and address (mailing and legal, if different) and, if applicable, the name and address of your representative;
- ◆ A daytime telephone number;
- ◆ A copy of the Order or decision you are appealing, and if the Order or decision followed an application, a copy of the application
- ◆ A brief statement regarding why you are appealing;
- ◆ The relief you seek (what you want PCHB to do); and
- ◆ A statement signed by you or your representative, attesting that the content of the appeal is true.

Complete information about appeal requirements is contained in state law (Chapter 43.21B RCW and Chapter 70.94 RCW) and in the Pollution Control Hearings Board regulations (Chapter 371-08 WAC). These may be found in some public libraries or county municipal law libraries.

**The Agency's Address is:**

Puget Sound Clean Air Agency  
110 Union Street, Suite 500  
Seattle, Washington 98101-2038

**PCHB's Address is:**

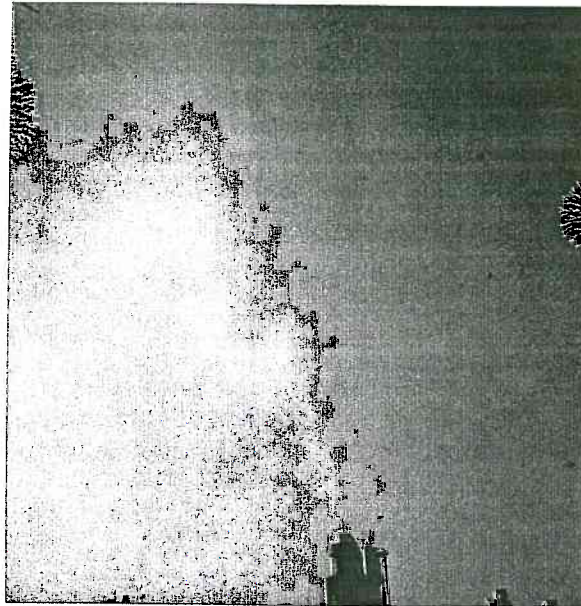
Pollution Control Hearings Board  
Environmental Hearings Office  
PO Box 40903  
Lacey, Washington 98504-0903  
Telephone: (360) 459-6327

Decisions are based on all the information in our files, including your written response to the CSR and any additional information received from the conference. Receiving a CSR does not necessarily mean you will receive a NOV or a civil penalty, nor does correcting the problem assure that you will not receive a NOV or a civil penalty. Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

A copy of the Agency's penalty policy is available upon request.

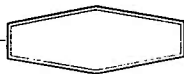
\*This page is a summary of the requirements related to a CSR.  
Consult applicable statutes and regulations for all requirements.

*Opacity*  
9/26 7:00 am - 4.1%  
8:00 am - 4.5%  
9:00 am - 11.5%  
10:00 am - 6.7%  
11:00 am - AGC 82M006731



10:00 AM  
9/26/00 Phil Johnson

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

October 25, 2000

Ms. Elizabeth Gilpin  
Puget Sound Clean Air Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Re: Compliance Status Report 9/29/00

Dear Ms. Gilpin:

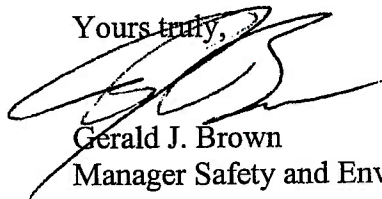
As shown by our opacity monitor, the constituents of the visible plume referred on 9/26/00 is particulate matter resulting from an upset condition in our main baghouse. The following opacity 24-hour averages were recorded:

07:00 hrs- 4.1%  
08:00 hrs- 4.5%  
09:00 hrs- 11.5%  
10:00 hrs- 6.7%  
11:00 hrs- 3.2%  
12:00 hrs- 3.1%

A ruptured bag caused the upset condition. The cause located and quickly rectified.

Please let me know if you have further questions.

Yours truly,



Gerald J. Brown  
Manager Safety and Environmental

Copy: HV





Seattle Plant

## facsimile

TRANSMITTAL

to: Melissa McAfee PSAPCA

Fax: 343-7522

re: Coal Mill

date: Monday October 30, 2000

Number of pages: Including cover 1

To follow up on the report seen below:

The cause of the #1 coal mill shut down this morning was two ruptured bags in the dust collector. The mill resumed operation following bag replacements at 11:40 am.

---

Per your request:

Visible emissions were reported this morning from #1 coal mill dust collector and the mill and dust collector was shut down. Shut down occurred at 5:30 am. Maintenance personnel were assigned upon their arrival at 6:30 am. The mill and D/C is presently shut down. The cause is believed to be a ruptured bag in the D/C. The cause cannot be confirmed at this time as entry has not yet been made. There is presently no visible emission

Coal Mill #2 system is operating. There is no visible emission other than steam that could be seen.

From the desk of ...

**Gerald J. Brown, CSP**  
Manager Safety and Environmental  
Ash Grove Cement Company  
3801 E. Marginal Way So.  
Seattle, WA 98134

(206) 694-6221  
fax: (206) 623-5355

AGCS2M000734



Seattle Plant

**facsimile**

TRANSMITTAL

to: **Melissa McAfee PSAPCA**

Fax: **343-7522**

re: **Coal Mill**

date: **Monday October 30, 2000**

Number of pages: Including cover **1**

Per your request:

Visible emissions were reported this morning from #1 coal mill dust collector and the mill and dust collector was shut down. Shut down occurred at 5:30 am. Maintenance personnel were assigned upon their arrival at 6:30 am. The mill and D/C is presently shut down. The cause is believed to be a ruptured bag in the D/C. The cause cannot be confirmed at this time as entry has not yet been made. There is presently no visible emission

Coal Mill #2 system is operating. There is no visible emission other than steam that could be seen.

From the desk of ...

**Gerald J. Brown, CSP**  
Manager Safety and Environmental  
Ash Grove Cement Company  
3801 E. Marginal Way So.  
Seattle, WA 98134

(206) 694-6221  
fax: (206) 623-5355

REC  
11/6/00

**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**

Date of Report October 31, 2000 at \_\_\_\_\_ .m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek</u>
Location <u>3801 E. Marginal Way So. Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my ~~inspection~~ review of your August 2000 CEM Report I noted the following deficiencies:  
NO

Please be advised that the CO standard  
is 1049 ppm corrected to 10% O<sub>2</sub> for an 8 hr  
Average pursuant to NOC # 7381 Condition #5 (a)

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

11-3-00  
Issued by: [Signature]

Received by \_\_\_\_\_

Signing this is not an admission of guilt



110 Union Street, Suite 500  
Seattle, WA 98101-2038  
Ph: 206.343.8800 / 1.800.552.3565  
Fax: 206.343.7522  
www.pscleanair.org

## Puget Sound Clean Air Agency Compliance Status Report

Inspection Date: 10/22/01

Time: \_\_\_\_\_

Case/Registration No. <u>11339</u>	Name <u>Ash Grove Cement</u>		Responsible Person, Title <u>Gerald Brown,</u> <u>ENV Mgr.</u>	
Site Address <u>3801 E. Marginal Wgs</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>	
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>206-623-5596</u>	

- ☒ I observed no violations of our agency's regulations during my inspection in the areas I inspected.\*
- ☐ I could not make a compliance determination because:
- ☐ I need to consult with others. I will share my conclusions with you either in person, over the phone, or in writing by \_\_\_\_\_.
  - ☐ I need more information. Please submit the following information by \_\_\_\_\_.

\* RATA Test Report dated 9/26/01 showed passing  
results for CEMs.

Issued By: \_\_\_\_\_

[Signature]  
Paul L. Quattrone

Received By: \_\_\_\_\_

Date/Time: \_\_\_\_\_

10-26-01